

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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COURTNEY LINDE, et al.,

Plaintiffs,

- against -

ARAB BANK, PLC,

Defendant.  
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: CV-04-2799 (BMC)(VVP)  
: and all related cases<sup>1</sup>  
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**JOINT SUBMISSION BY ALL PARTIES**

In accordance with the Court's direction at the November 7, 2014 status conference, all parties make this joint submission setting forth their positions and proposals regarding anticipated damages trials.

- (1) The parties are unable to agree upon a mutually-acceptable framework for the damages phase of this case.
- (2) The parties decline, in the alternative, to consent to the district court establishing the parameters for assessing damages by a Special Master.
- (3) Plaintiffs' proposals are set forth in Exhibit A.
- (4) Defendant's proposal is set forth in Exhibit B.

Dated: December 5, 2014

Respectfully submitted,

OSEN LLC  
SAYLES WERBNER  
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<sup>1</sup> *Little v. Arab Bank, PLC*, No. CV-04-5449 (E.D.N.Y. 2004) (BMC) (VVP); *Almog v. Arab Bank, PLC*, No. CV-04-5564 (E.D.N.Y. 2004) (BMC) (VVP); *Coulter v. Arab Bank, PLC*, No. CV-05-365 (E.D.N.Y. 2005) (BMC) (VVP); *Afriat-Kurtzer v. Arab Bank, PLC*, No. CV-05-388 (E.D.N.Y. 2005) (BMC) (VVP); *Bennett v. Arab Bank, PLC*, No. CV-05-3183 (E.D.N.Y. 2005) (BMC) (VVP); *Roth v. Arab Bank, PLC*, No. CV-05-3738 (E.D.N.Y. 2005) (BMC) (VVP); and *Weiss v. Arab Bank, PLC*, No. CV-06-1623 (E.D.N.Y. 2006) (BMC) (VVP).